

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE; and
MASSACHUSETTS INSTITUTE OF
TECHNOLOGY,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY; U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT; CHAD F. WOLF, in his
official capacity as Acting Secretary of the
United States Department of Homeland
Security; and MATTHEW ALBENCE, in his
official capacity as Acting Director of U.S.
Immigration and Customs Enforcement,

Defendants.

Civil Action No. 1:20-cv-11283-ADB

**MOTION FOR LEAVE TO FILE
REPLY IN SUPPORT OF MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Local Rule 7.1(b)(3), Plaintiffs hereby respectfully request leave to file a reply in support of their Motion for a Preliminary Injunction (ECF No. 30). As the Court has recognized, *see* ECF No. 25, a reply brief in this case is appropriate because the case presents novel and complex questions of law, and because Defendants have raised arguments that Plaintiffs did not have the opportunity to brief in their Motion.

A proposed order and the reply brief are attached.

Dated: July 14, 2020

Respectfully submitted,

/s/ Felicia H. Ellsworth

William F. Lee (BBO #291960)

Mark C. Fleming (BBO #639358)

Felicia H. Ellsworth (BBO #665358)

Michelle Liszt Sandals (BBO #690642)

WILMER CUTLER PICKERING

HALE AND DORR LLP

60 State Street

Boston, MA 02109

Telephone: (617) 526-6000

E-mail: felicia.ellsworth@wilmerhale.com

Seth P. Waxman (*pro hac vice*)

Paul R.Q. Wolfson (*pro hac vice*)

Ari Holtzblatt (*pro hac vice*)

Alex Hemmer (*pro hac vice*)

WILMER CUTLER PICKERING

HALE AND DORR LLP

1875 Pennsylvania Avenue, N.W.

Washington, D.C. 20006

Telephone: (202) 663-6000

RULE 7.1(A)(2) CERTIFICATE

I, Felicia H. Ellsworth, hereby certify that on July 13, 2020, counsel for Plaintiffs provided notice to and attempted to confer in good faith with counsel for the Defendants to discuss whether it would be possible to resolve or narrow the issues that this Motion presents.

/s/ Felicia H. Ellsworth
FELICIA H. ELLSWORTH

CERTIFICATE OF SERVICE

I, Felicia H. Ellsworth, counsel for Plaintiffs, hereby certify that this document has been filed through the Court's ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Felicia H. Ellsworth
FELICIA H. ELLSWORTH